

F A R E R F E R S K O

A PROFESSIONAL ASSOCIATION ATTORNEYS AT LAW

June 13, 2011

Via ECF

Magistrate Judge Torianne J. Bongiovanni  
Clarkson S. Fisher Federal Building  
and U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: ANJRPC, et al. v. Christopher J. Christie, Governor of New Jersey et al.  
Docket No.: 3:10-cv-00271-JAP-TJB  
Our File No.: 011901

Dear Judge Bongiovanni:

We represent the Plaintiffs in the above-referenced matter.

Now pending before Your Honor is a motion to seal certain reply papers filed by the City of Hackensack ("Hackensack") in connection with pending dispositive motions and cross motions. Plaintiffs view Hackensack's proposed order as insufficient under the rules and incomplete to fully protect confidential information.

Accordingly, we have spent considerable time negotiating with Hackensack in order to resolve this motion by consent. However, we have ultimately been unable to obtain consent of all parties to a form or order. Hackensack has indicated that it prefers to leave the form of order up to the Court and does not wish to consent to any change in its proposed order.

Plaintiffs and the State Defendants have consented to the attached form of order, and Plaintiffs respectfully request that the Court enter this form of order in lieu the order submitted by Hackensack.

Thank you for your attention in this regard.

Respectfully submitted,

/s/ Daniel L. Schmutter

Daniel L. Schmutter  
DLS:ahd

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